Mr. James Roark
Rieter Automotive North America, Inc.
101 West Oakley Avenue
Lowell, Indiana 46356-2206

Re: 089-11823-00013
Significant Source Modification to:
Part 70 permit No.: T089-6629-00013

Dear Mr. Roark:

Rieter Automotive North America, Inc. was issued Part 70 operating permit on 089-6629-00013 on June 16, 1999 for a stationary automotive sound deadening product manufacturing operation. An application to modify the source was received on January 26, 2000. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

(a) One (1) barrier/foam recovery process line, which will process 2,000 pounds per hour of foam trim scrap. This line will include the following:

(1) Two (2) grinders;
(2) Four (4) process cyclones;
(3) Four (4) process collectors;
(4) Two (2) multi-stage aspirators, five (5) fans, conveying system;
(5) One (1) baghouse to control the particulate matter emissions.

This barrier/foam recovery process line will be used to grind the trim scrap from the foam injection line. The first grinding stage is to achieve a particle size of three-fourth (3/4) of an inch. After the grinder, the material passes through the first collector and cyclone where the fines are separated and sent to the baghouse, and the foam and barrier drops into the first aspirator. Here the foam is separated from the barrier. The foam is sent to a cyclone where the fines are separated from the foam and sent to the baghouse and the foam is dropped into gaylord's to be stored for shipment.

The second grinding stage is to achieve a particle size of one-fourth (1/4) of an inch. The barrier from the first aspirator drops into the second grinder where the size is reduced to one-fourth (1/4) inch. This material is sent to a collector and cyclone where the fines are separated and sent to the baghouse. The heavier material goes into the second aspirator. Here, the barrier and any foam that was missed at the first stage are separated with the barrier dropping into gaylord's for re-processing on the existing permitted Line 6, 7 and 8 as reclaim and the foam is sent to a collector and cyclone where fines are separated and sent to the baghouse. The heavier part is dropped into the scrap hopper for landfill disposal. The fines that are collected in the baghouse are also dropped into the scrap hopper for landfill disposal.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The proposed operating conditions applicable to these emission units are attached to this Source Modification approval. These proposed operating conditions shall be incorporated into the Part 70 operating permit as an administrative amendment in accordance with 326 IAC 2-7-10.5(l)(1) and 326 IAC 2-7-11.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
APD
cc: File - Lake County
U.S. EPA, Region V
Lake County Health Department
Northwest Regional Office
Air Compliance Section Inspector - Rick Massoels/Ramesh Tejuja
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 SIGNIFICANT SOURCE MODIFICATION
OFFICE OF AIR MANAGEMENT

Rieter Automotive North America, Inc.
101 West Oakley Avenue
Lowell, Indiana 46356-2206

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

1st Significant Source Modification No.: 089-11823-00013	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION D.8 FACILITY OPERATION CONDITIONS

1. Facility Description [326 IAC 2-7-5(15)]
One (1) barrier/foam recovery process line, which will process 2,000 pounds per hour of foam trim scrap. This line will include the following:

(1) Two (2) grinders;
(2) Four (4) process cyclones;
(3) Four (4) process collectors;
(4) Two (2) multi-stage aspirators, five (5) fans, conveying system;
(5) One (1) baghouse to control the particulate matter emissions.

This barrier/foam recovery process line will be used to grind the trim scrap from the foam injection line. The first grinding stage is to achieve a particle size of three-fourth (3/4) of an inch. After the grinder, the material passes through the first collector and cyclone where the fines are separated and sent to the baghouse, and the foam and barrier drops into the first aspirator. Here the foam is separated from the barrier. The foam is sent to a cyclone where the fines are separated from the foam and sent to the baghouse and the foam is dropped into gaylord's to be stored for shipment.

The second grinding stage is to achieve a particle size of one-fourth (1/4) of an inch. The barrier from the first aspirator drops into the second grinder where the size is reduced to one-fourth (1/4) inch. This material is sent to a collector and cyclone where the fines are separated and sent to the baghouse. The heavier material goes into the second aspirator. Here, the barrier and any foam that was missed at the first stage are separated with the barrier dropping into gaylord's for re-processing on the existing permitted Line 6, 7 and 8 as reclaim and the foam is sent to a collector and cyclone where fines are separated and sent to the baghouse. The heavier part is dropped into the scrap hopper for landfill disposal. The fines that are collected in the baghouse are also dropped into the scrap hopper for landfill disposal.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.8.1 Particulate Matter (PM) [326 IAC 6-1-2]
Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the one (1) new barrier/foam recovery process line shall be limited to 0.03 grain per dry standard cubic foot, or an equivalent 1.93 pounds per hour.

Compliance Determination Requirements

D.8.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]
The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.8.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.8.3 Particulate Matter (PM)
The baghouse for PM control shall be in operation at all times that the barrier/foam recovery process line is in operation.

Compliance Monitoring Requirements

D.8.4 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the barrier/foam recovery process line operation and every three months thereafter. All defective bags shall be replaced.

D.8.5 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.8.6 Record Keeping Requirements

(a) To document compliance with Condition D.8.1, the Permittee shall maintain records of the results of the inspections required under Condition D.8.4, and the dates when defective bags where replaced.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Significant Source Modification

Source Background and Description

Source Name:	Rieter Automotive North America, Inc.
Source Location:	101 West Oakley Avenue
County:	Lake County
SIC Code:	3714
Operation Permit No.:	089-6629-00013
Operation Permit Issuance Date:	June 16, 1999
Significant Source Modification No.:	089-11823-00013
Permit Reviewer:	Aida De Guzman

The Office of Air Management (OAM) has reviewed a source modification application from Rieter Automotive North America, Inc. relating to the construction and operation of new facilities, used in the manufacture of automotive sound deadening products.

(a) One (1) barrier/foam recovery process line, which will process 2,000 pounds per hour of foam trim scrap. This line will include the following:

(1) Two (2) grinders;
(2) Four (4) process cyclones;
(3) Four (4) process collectors;
(4) Two (2) multi-stage aspirators, five (5) fans, conveying system;
(5) One (1) baghouse to control the particulate matter emissions.

This barrier/foam recovery process line will be used to grind the trim scrap from the foam injection line. The first grinding stage is to achieve a particle size of three-fourth (3/4) of an inch. After the grinder, the material passes through the first collector and cyclone where the fines are separated and sent to the baghouse, and the foam and barrier drops into the first aspirator. Here the foam is separated from the barrier. The foam is sent to a cyclone where the fines are separated from the foam and sent to the baghouse and the foam is dropped into gaylord's to be stored for shipment.

The second grinding stage is to achieve a particle size of one-fourth (1/4) of an inch. The barrier from the first aspirator drops into the second grinder where the size is reduced to one-fourth (1/4) inch. This material is sent to a collector and cyclone where the fines are separated and sent to the baghouse. The heavier material goes into the second aspirator. Here, the barrier and any foam that was missed at the first stage are separated with the barrier dropping into gaylord's for re-processing on the existing permitted Line 7 as reclaim and the foam is sent to a collector and cyclone where fines are separated and sent to the baghouse. The heavier part is dropped into the scrap hopper for landfill disposal. The fines that are collected in the baghouse are also dropped into the scrap hopper for landfill disposal.

History

On January 26, 2000, Rieter Automotive North America, Inc. submitted an application to the OAM requesting to add additional product recovery process line to their existing plant. Rieter Automotive North America, Inc. was issued a Part 70 permit (T089-6629-0013) on June 16,

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
BF-1	barrier/foam recovery process line	5' above the roof line	1.25	7521	ambient

Recommendation

The staff recommends to the Commissioner that the Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on January 26, 2000.

Emission Calculations

(a) Barrier/foam recovery process line PM Emissions:

Baghouse Control Efficiency = 99%

Baghouse Air Flow Rate (cuft/min)	Outlet Grain Loading (gr/cuft	PM Emissions (tons/yr)	PM Controlled Emissions (tons/yr)
7521	0.03	847	8.47

Methodology:
PM Emissions Controlled Emissions = air flow rate, cuft/min * outlet grain loading, gr/cuft * lb/7000 gr * 60 min/hr * 8760 hr/yr * ton/2000 lb
PM Emissions Uncontrolled Emissions = PM Controlled Emissions, ton/yr / 1-0.99)

Potential To Emit Before Controls (Modification)

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution

control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	847
PM-10	847
SO_2	0.0
VOC	0.0
CO	0.0
NO_x	0.0

Justification for Modification

The Title V is being modified through a Significant Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4)(A), because the particulate matter (PM) or PM10 are emitted at more than twenty-five (25) tons per year (threshold for a significant source modification).

County Attainment Status

The source is located in Lake County.

Pollutant	Status (attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)
PM10	Moderate nonattainment for East Chicago, Hammond, Whiting and Gary. **Lowell where the source is located is attainment**.
SO_2	Nonattainment for an area on the north by Lake Michigan, on the west by the IN-IL State line, on the south by US 30 from the state line to the intersection of I-65 then ff. I-65 to the intersection of I-94, then ff. I-94 to the Lake-Porter County line, & on the east by the Lake-Porter County line. **Lowell where the source is located is attainment**.
NO_2	severe
Ozone	severe
CO	Nonattainment for part of E. Chicago **Lowell where the source is located is attainment**.
Lead	Not determined

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as severe nonattainment for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(b) The part of Lake County where the source is located has been classified as attainment for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity):

PERMIT NO./ ISSUED DATE	PERMITTED/ALLOWABLE EMISSIONS (TONS/YEAR)						
	PM	PM10	VOC	NOX	CO	SO2	HAPs
Registration: CP089-9967 Nov. 28, 1998	1.25	1.25	109.6	0.0	0.9	0.0	1.15
Exempted: CP089-9217 May 22, 1998	0.9	0.9		4.47	4.0	0.0	0.0
Exempted: CP089-8353 July 8, 1997	0.0	0.0		0.0	0.0	0.0	0.02
Registration: CP089-8167 May 5, 1997	6.96	6.96		8.63	0.0	00	0.56
CP089-6837 Dec. 23, 1996	14.5	9.3		2.1	5.0	0.1	0.0
CP089-5604 July 30, 1996	1.9	1.9		27.2	5.9	1.8	0.0
Registration: CP089-4720 Feb. 2, 1996	0.2	0.2		1.3	0.3	0.01	17.75
Registration: CP089-4717 Dec.1, 1995 Amended A-089-5351 March 4, 1996	6.94	6.94		8.5	2.1	0.04	0.15
Registration: CP089-4774 Nov. 6, 1995	3.9	3.9					
Registration: CP089-4719 Sept. 26, 1995	0.7	.7		7.2	1.8	0.0	0.0
Exempted: CP089-4718 Aug. 23, 1995	0.004	0.004		0.06	0.08	0.0004	0.0
Registration:089-4461 May 23, 1995 Amended A089-4642 Aug. 28, 1995	6.89	6.89		2.6	0.6	0.0	0.0
Exempted: CP089-4301 Feb. 17, 1995	0.03	0.03		1.53	0.38	0.01	0.17
Exempted: CP089-4282 Jan. 12, 1995	2.8	2.8		0.0	0.0	0.0	0.0
TOTAL	53.27	41.7	109.6	63.6	18.9	1.96	19.8

Note: VOC emission was based from 1997 Airs Facility Subsystem Quick Look Report.

(a) This existing source is a major stationary source for ozone, because VOC and NOx are each emitted at a rate greater than 25 tons per year or more.

(b) This existing source is a not a major stationary source for PM, PM10, CO and SO2, because these nonattainment pollutants are not emitted at a rate of 100 tons per year or more.

Actual Emissions

The following table shows the source's actual emissions, as reflected in the OAM and source's emission data:

Pollutant	Emissions (tons/year)
PM	18.9
PM-10	11.3
SO_2	0.1
VOC	22.0
CO	2.9
NOx	14.6
HAP (Phenol)	23.4
HAP (Formaldehyde)	12.0
HAP (Vinyl Acetate)	1.4

Potential to Emit After Controls for the Modification

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Barrier/foam recovery process line	8.47	8.47	0.0	0.0	0.0	0.0	0.0
Total Emissions	8.47	8.47	0.0	0.0	0.0	0.0	0.0

This modification to an existing major stationary source is not major because the PM (attainment pollutant) emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

(a) New Source Performance Standards (NSPS):
There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) National Emission Standards for Hazardous Air Pollutants (NESHAPs):
There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

(a) 326 IAC 2-6 (Emission Reporting)
This modification will not trigger this rule applicability, because it only emits PM and is not regulated under this rule. However, this rule will apply to the source because it is a Part 70 source emitting greater than 100 tons of VOC per year. The rule applicability threshold for a source located in Lake County is only 10 tons per year.

(b) 326 IAC 5-1 (Visible Emissions Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(1) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

(a) 326 IAC 8 (Volatile Organic Sources)
There are no provisions under 326 IAC 8 that apply to the barrier/foam recovery process line, because no VOC is emitted from this process.

(b) 326 IAC 6-1-2 (Nonattainment Area PM Emissions Limitations)
This rule applies to sources or facilities that have potential to emit one hundred (100) tons or more of particulate matter per year or have actual emissions of ten (10) tons or more of particulate matter.

The barrier/foam recovery process line is subject to this rule, because its PM potential to emit is greater than 100 tons per year. This rule mandates a PM emissions limit of 0.03 grains per dry standard cubic feet (gr/dscf), or an equivalent of 8.47 pounds per hour.

The source is in compliance with this limit, since the baghouse grain loading is 0.03 gr/dscf.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

None of the listed air toxics will be emitted from this source.

Conclusion

The operation of this barrier/foam recovery process line shall be subject to the conditions of the attached proposed **Significant Source Modification No. 089-11823-00013**.

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for Significant Source Modification and Operation

Source Name:	Rieter Automotive North America, Inc.
Source Location:	101 West Oakley Avenue, Lowell, Indiana 46356
County:	Lake
SIC Code:	3714
1st Significant Source Modification:	089-11823-00013
Permit Reviewer:	Aida De Guzman

On February 28, 2000, the Office of Air Management (OAM) had a notice published in The Times, Munster, Indiana, stating that Rieter Automotive North America, Inc. had applied for a construction permit to construct and operate one (1) barrier/foam recovery process line with a baghouse to control the PM emissions. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On March 22, 2000, Rieter Automotive North America, Inc. submitted comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows (changes are bolded and deletions are struck-through for emphasis):

Comment 1: The following line on page 1 of 2 of the draft letter, fourth paragraph sixth line "re-processing on the existing permitted Line 7 as reclaim and the foam is sent to a collector and..." be changed to read "re-processing on the existing permitted Line 6, 7 and 8 as reclaim and foam is sent to a collector and..."

The above change should also be reflected in the project description table on Section 8.

Response 1: The fourth paragraph of the draft letter was changed to reflect your comments as follows:

The second grinding stage is to achieve a particle size of one-fourth (1/4) of an inch. The barrier from the first aspirator drops into the second grinder where the size is reduced to one-fourth (1/4) inch. This material is sent to a collector and cyclone where the fines are separated and sent to the baghouse. The heavier material goes into the second aspirator. Here, the barrier and any foam that was missed at the first stage are separated with the barrier dropping into gaylord's for re-processing on the existing permitted Line **6,** 7 **and 8** as reclaim and the foam is sent to a collector and cyclone where fines are separated and sent to the baghouse. The heavier part is dropped into the.....

Section 8 project description table was also revised to reflect the change.

Comment 2: Condition D.8.1 of the draft permit has a typographical error on the Particulate Matter (PM) allowable emissions, the grain per dry standard cubic foot equivalent of 8.47 pounds per hour should be 1.93 pounds per hour.

Response: 2: A recalculation has been made, the grain per dry standard cubic foot equivalent emissions should be 1.93 pounds per hour, instead of 8.47 pounds per hour. Therefore, condition D.8.1 PM allowable emissions of 8.47 was changed to 1.93.

Comment 3: Page 2 of 3 Conditions D.8.4 and D.8.5 are listed under Compliance Determination Requirements and they should be changed to be listed under Compliance Monitoring Requirements. Section D.8.5 even discusses "....response steps according to the timetable described in the Compliance Response Plan..." and Condition C.15 of our Part 70 permit, Compliance Monitoring Plan requires a Compliance Response Plan only for each Compliance Monitoring Condition in Section D of the permit. Therefore, this change would be in line with the format of our Part 70 permit.

Response 3: "**Compliance Monitoring Requirements**" is added after Condition D.8.3 of the permit, thus listing Conditions D.8.4 and D.8.5 under it.

Comments to the Technical Support Document (TSD)

Comment 4: Page 1 of 7 of the TSD fifth paragraph sixth line "re-processing on the existing permitted Line 7 as reclaim and the foam is sent to a collector and..." be changed to read "re-processing on the existing permitted Line 6, 7 and 8 as reclaim and foam is sent to a collector and..."

Response 4: The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

The fifth paragraph, sixth line of the original TSD was changed to reflect your comments as follows:

The second grinding stage is to achieve a particle size of one-fourth (1/4) of an inch. The barrier from the first aspirator drops into the second grinder where the size is reduced to one-fourth (1/4) inch. This material is sent to a collector and cyclone where the fines are separated and sent to the baghouse. The heavier material goes into the second aspirator. Here, the barrier and any foam that was missed at the first stage are separated with the barrier dropping into gaylord's for re-processing on the existing permitted Line **6,** 7 **and 8** as reclaim and the foam is sent to a collector and cyclone where fines are separated and sent to the baghouse. The heavier part is dropped into the.....

Comment 5: Page 2 of 7 of the TSD, History Section third line of the 1st paragraph, the date should read June 16, 1999. The year was left off.

Response 5: The 1st paragraph of page 2 of 7 of the TSD was corrected as follows:

History

On January 26, 2000, Rieter Automotive North America, Inc. submitted an application to the OAM requesting to add additional product recovery process line to their existing plant. Rieter Automotive North America, Inc. was issued a Part 70 permit (T089-6629-0013) on June 16, **1999**.

Comment 6: Page 4 of 7 of the TSD, Source Status table, some of the permitted/allowable emissions (tons/year) are not accurately stated as they differ from the table created by IDEM, OAM in Minor Source Modification permit # 089-10909-00013.

Response 6: The table has been revised, and accounted for the changes made in previous permits

that were affected by permit 089-10909, issued on August 16, 1999. See below notes * reflected in permit 089-10909.

* Potential to emit (PTE) of the fire pump is limited based on an enforceable limitation on fuel usage (1,199 gallons of fuel per month) which was included in CP-089-5604.

** Potential emissions from the thermal oxidizer (T.O.) are based on AP-42 emission factors and an alternate emission factor for NOx of 1.26 lb/hr proposed by the applicant based on stack testing. The emissions reflected in the table are net emissions and account for the decrease in combustion emissions from the removal of the old T.O. (3.7 MMBtu/hr ~ 1.6 tons/yr NOx reduction).

*** Based on revised NOx emission rate information submitted by the applicant, the potential emissions from the thermal oxidizer exempted in CP-089-9217-00013 should have accounted for the increased flow of NH4 which resulted from the ductwork changes. This increased NH4 loading to the T.O. will result in increased NOx emissions from this process. The increase in NOx emissions from the duct work modifications is 1.40 lbs/hr (6.13 tons/yr) and has been added as emissions for the project.

PERMIT NO./ ISSUED DATE	PERMITTED/ALLOWABLE EMISSIONS (TONS/YEAR)						
	PM	PM10	VOC	NOX	CO	SO2	HAPs
Registration: CP089-9967 Nov. 28, 1998	1.25	1.25		0.0	0.9	0.0	1.15
Exempted: CP089-9217 May 22, 1998 Source Modification 089-10909- Aug. 16, 1999	0.~~9~~ **0**	0.~~9~~ **0**		~~4.47~~ **3.91 + 6.13 10.04**	4.0	0.0	0.0
Exempted: CP089-8353 July 8, 1997	0.0	0.0		0.0	0.0	0.0	0.02
Registration: CP089-8167 May 5, 1997	~~6.96~~ **0.02**	~~6.96~~ **0.0 2**		~~8.63~~ **0.13**	0.0	00	0.56
CP089-6837 Dec. 23, 1996	14.5	9.3		2.1	5.0	0.1	0.0
CP089-5604 July 30, 1996	~~1.9~~ **0.11**	~~1.9~~ **0.11**		~~27.2~~ **4.41**	~~5.9~~ **0.33**	1.8	0.0
Registration: CP089-4720 Feb. 2, 1996	0.2	0.2		1.3	0.3	0.01	17.75
Registration: CP089-4717 Dec.1, 1995 Amended A-089-5351 March 4, 1996	6.94	6.94		8.5	2.1	0.04	0.15
Registration: CP089-4774 Nov. 6, 1995	3.9	3.9		0.0	0.0	0.0	0.0
Registration: CP089-4719 Sept. 26, 1995	0.~~7~~ **2**	0.~~7~~ **2**		~~7.2~~ **3.3**	1.~~8~~ 0	0.0	0.0
Exempted: CP089-4718 Aug. 23, 1995	0.004	0.004		0.06	0.08	0.0004	0.0

Registration:089-4461 May 23, 1995 Amended A089-4642 Aug. 28, 1995	6.89	6.89		2.6	0.6	0.0	0.0
Exempted: CP089-4301 Feb. 17, 1995	0.03	0.03		1.53	0.38	0.01	0.17
Exempted: CP089-4282 Jan. 12, 1995	2.8	2.8		0.0	0.0	0.0	0.0
TOTAL	~~53.27~~ **36.8**	~~41.7~~ **31.6**	109.6	~~63.6~~ **33.97**	18.9	1.96	19.8

Comment 7: Page 5 of 7 of the TSD, Source Status, Section (a) should be changed to read as follows:

(a) This existing source is a major stationary source for ozone, because VOC and NOx have ~~are each emitted at a rate have~~ **potential emissions** greater than 25 tons per year ~~or more~~.

Source Status Section (b) states that "The existing source is not a major stationary source for PM, PM10, CO and SO2, because these nonattainment pollutants are not emitted at a rate of 100 tons per year or more". In the past the source has been determined to be a major source for PM and PM10 and this determination should be reflected in this section.

Response 7: Section (a) and (b) of the **Source Status** are based on potential to emit "PTE" and not on potential emissions. These section is revised as follows:

Source Status

(a) This existing source is a major stationary source for ozone, because VOC and NOx are ~~each~~ emitted at a rate greater than of 25 tons per year ~~or more~~.

(b) **This existing source is a major stationary source for PM and PM10, because these nonattainment pollutants are emitted at a rate greater than 100 tons per year.**

Comment 8: Page 6 of 7, State Rule Applicability - Entire Source. The third line of (a) which states 100 tons per year should be changed to 25 tons per year.

Response 8: Although the applicability threshold for Part 70 permit for VOC in a severe nonattainment area is 25 tons per year, section (a) of this rule is simply stating the fact that the VOC is emitted at greater than 100 tons per year. However, to simplify this statement, the 100 tons per year is changed to 25 tons per year. Revision is as follows:

(a) 326 IAC 2-6 (Emission Reporting)
This modification will not trigger this rule applicability, because it only emits PM and is not regulated under this rule. However, this rule will apply to the source because it is emitting greater than ~~100~~ **10** tons of VOC per year, located in Lake County.

Comment 9: Page 6 of 7 State Rule Applicability - Individual Facilities (b) second paragraph third line, the grains per dry standard cubic feet (gr/dscf) equivalent emission of 8.47 pounds per hour should be 1.93 pounds per hour. The 8.47 as written reflects tons per year not pounds per hour.

Response 9: This section was revised as follows: This comment was also addressed in Response 2:

326 IAC 6-1-2 (Nonattainment Area PM Emissions Limitations)
This rule applies to sources or facilities that have potential to emit one hundred (100) tons or more of particulate matter per year or have actual emissions of ten (10) tons or more of particulate matter.

The barrier/foam recovery process line is subject to this rule, because its PM potential to emit is greater than 100 tons per year. This rule mandates a PM emissions limit of 0.03 grains per dry standard cubic feet (gr/dscf), or an equivalent of ~~8.47~~ **1.93** pound per hour.

The source is in compliance with this limit, since the baghouse grain loading is 0.03 gr/dscf.